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December 17, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: Comments of the California Broadcasting
Association - MM Docket No. 87-268

Dear Ms. Salas:

Transmitted herewith is an original and nine (9) copies of the
Comments of the California Broadcasting Association in the above-
reference rulemaking proceeding.

Should you have any questions, please contact undersigned
counsel.

Sincerely,


Gregg P. Skall

Counsel for The California
Broadcasting Association

Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Advanced Television Systems)
And Their Impact Upon the) MM Docket No. 87-268
Existing Television)
Broadcast Service)

To: The Commission

COMMENTS OF
CALIFORNIA BROADCASTING ASSOCIATION

The California Broadcasting Association,¹ by and through its attorney, hereby submits the following Comments responding to the "Ex Parte Submission" by the Association for Maximum Service Television, Inc. et al. (collectively "MSTV") filed on November 20, 1997. On December 2, 1997, the Federal Communications Commission ("FCC" or "Commission") released its Public Notice announcing a limited window to file comments on the proposal, ending on December 17, 1997. In light of the foregoing, the following comments are respectfully submitted in support of MSTV.

I. **BACKGROUND**

The Fifth Report and Order and the Sixth Report and Order, adopted by the Commission in the Advanced Television proceeding, established the rules for the implementation of digital television

¹ The California Broadcasting Association ("CBA") is the trade association with its membership consisting of substantially all radio and television stations located in California.

across the nation.^{2/} In the Fifth Report and Order, the Commission established the criteria for eligibility and the implementation schedule for digital television. The Sixth Report and Order set forth the allotment and assignment principles, and adopted the DTV Table of Allotments. Central to the adoption of the DTV Table of Allotments was the designation of a "Core" spectrum, in which all DTV licensees would be placed. Further, the Commission adopted rules to protect stations from interference based on the predicted coverage contour.

Over 250 Petitions for Reconsideration were filed in response, the majority citing specific occurrences of severe predicted interference with respect to a particular licensee. In response, MSTV developed a new DTV Table of Allotments, which made over 350 improvements to the channel assignments contained in the FCC DTV Table of Allotments.

As discussed below, these improvements were made through the modification of the DTV rules and the limited placement of channel assignments in the "Core" spectrum. In light of the overwhelming improvements to the original DTV Table, CBA supports the adoption of the MSTV DTV Table as a viable plan to solve many of the pending Petitions for Reconsideration, and believes its adoption will expedite the introduction of the digital television service.

² In re Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service, Fifth Report and Order, 7 Comm. Reg. (P&F) 893 (1997) [hereinafter Fifth Report and Order]; In re Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service, Sixth Report and Order, 7 Comm. Reg. (P&F) 994 (1997) [hereinafter Sixth Report and Order].

II. DISCUSSION

As stated, the MSTV DTV Table will make substantial improvements to the predicted interference that DTV stations will experience. Through these improvements, several highly-congested regions of the country will experience a substantial lessening of the predicted interference.

These improvements are made through the additional placement of a limited number of stations in the 60-69 channel band, and the use of distance-based contour protection, rather than the Commission's plan to use the predicted coverage contour to establish interference protection.

By placing a limited number of stations outside of the "Core" region, the MSTV DTV Table provides each station an opportunity to expand its service to its community of license. Further, those stations that intend to make future modifications to its facilities will have a greater opportunity to do so, without causing increased interference to surrounding stations. Further, the use of distance-based contours, rather than the predicted coverage contour, to establish the protected service area will permit each station to provide a clearer signal within its protected service area.

Specifically, the improvements made by MSTV to the FCC DTV Table reduces the overall interference to NTSC and DTV service in the southern California region by twenty-five percent (25%). Furthermore, the MSTV DTV Table increases the DTV replication of its NTSC signal for six individual stations by more than five

percent.³ Finally, for seven stations,⁴ their predicted interference will be reduced by more than three percent (3%). These improvements will make a real difference to each of these stations, as the reduction of interference, and the increase in the station's DTV signal replication, will lead to increased service to its licensed community.

III. CONCLUSION

Thus, by adopting the MSTV DTV Table of Allotments, the Commission will improve a significant number of television licensees that would otherwise suffer severe short-spacing. The MSTV DTV Table provides substantial improvement to the DTV signal replication, and reduces the interference for a number of California stations. As a result, each station will have an opportunity to better serve its licensed community.

Therefore, the California Broadcasting Association supports the MSTV's proposed changes, and urges the Commission replace its

³ KMTP(TV), San Francisco, CA (36%); KTSF(TV), San Francisco, CA (34.3%); KDTV(TV), San Francisco, CA (24.1%); KRPA(TV), Rancho Palos Verdes, CA (20.9%); KWHY(TV), Los Angeles, CA(7.5%); KRCA(TV), Riverside, CA (7.2%).


⁴ KVEA(TV), Corona CA (6.6%); KUSI, San Diego CA (9.9%); KFMB(TV), San Diego CA (28.2%); KBSV, Ceres CA (5.4%); KICU(TV), San Jose CA (3.1%); KMTP, San Francisco CA (8.0%); KSWB(TV), San Diego CA (11%).

DTV Table with that submitted by MSTV.

Respectfully submitted,

The California Broadcasting Association

By



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Its Attorney

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